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BY ECF ONLY

Honorable Steven L. Tiscione
United States Magistrate Judge
Eastern District of New York
Federal District Court
100 Federal Plaza
Central Islip, NY 11722

December 21, 2021

Oscar Holt III

Of Counsel

Re: *Cipley v. County of Nassau, et al.*, No. 20-cv-975

Dear Judge Tiscione:

As you are aware, this office represents Plaintiff Donna Cipley in the above-captioned action. We write this letter after conferring with Defense counsel and provide this letter as a joint submission.

The parties respectfully request that the Court schedule a discovery conference so that we can discuss with your honor a comprehensive plan for completing discovery in this matter. As of now Plaintiff's discovery demands, and depositions in this matter remain outstanding. In an attempt work out any issues, Plaintiff conferred with Defendants on several occasions to obtain responses to these demands. Plaintiff appreciates that Defendants' counsel is new to the case, has been engaged in a trial in another matter, and that it takes time for them to obtain records from the County. However, the discovery deadline in this action is January 31, 2022. Unfortunately, with the holidays, that leaves the parties little time to receive the outstanding responses, follow up on those disclosures, take depositions, assuming that document responses will be provided in short order. Moreover, Counsel is currently scheduled to take depositions in other cases for much of January. The parties are not opposed to extending the scheduling order in this action, but seeks to avoid having to rush to conclude discovery in this matter.

Accordingly, we believe the best way to work these matter out is to conference you're your Honor. Thank you for your consideration of this request. Should you have any questions or concerns, please do not hesitate to contact me.

Respectfully Submitted,
/s *FREDERICK K. BREWINGTON*
FREDERICK K. BREWINGTON

FK:md

cc: Oscar Michelen Esq., (Via ECF)